



WISCONSIN

DEPARTMENT OF WORKFORCE DEVELOPMENT

Division of Economic Support

Bureau of Work Support Programs

**TO: Economic Support Supervisors
Economic Support Lead Workers
Training Staff
Child Care Coordinators
W-2 Agencies**

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BWSP OPERATIONS MEMO

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Non W-2 ☐ **W-2** ☒ **CC** ☐

PRIORITY: High

SUBJECT: W-2 24 MONTH TIME LIMIT EXTENSIONS POLICY REMINDER

CROSS REFERENCE: W-2 Manual
BWI Operations Memos 99-21 & 99-49 (Policy)
BWI Operations Memos 99-41, 99-60, 99-69, 99-89 (CARES)

PURPOSE

This Operations Memo provides:

1. Policy reminders regarding time limits and extension requests.
2. A new report to assist agencies in tracking cases approaching the time limit.
3. A W-2 Extensions Desk Aid to use when entering extension information into CARES.

BACKGROUND

With individuals now reaching their 24-month time limit on a monthly basis, Division of Economic Support would like to restate specific time limit/extension policies and procedures that are currently in place. The importance of these specific policies and procedures are threefold:

1. They ensure that W-2 agencies are informing participants of the extension option and the criteria under which a participant must qualify.
2. They allow the W-2 agencies and the Department of Workforce Development enough time to process extension materials.
3. They allow participants enough time to dispute decisions, if necessary, prior to reaching their 24th month.

These policy reminders should not be taken as a comprehensive list of all policies as they relate to time limits and extension materials. The policies restated in this memo were selected because, based on our experience thus far with extensions, these particular policies appear to be overlooked the most when agencies are processing extension materials. Therefore, for a comprehensive list of program policies related to extensions, W-2 agencies should continue to use Operations Memos 99-21, 99-49 and 99-89 as reference materials.

Most CARES procedures have been incorporated into the attached *W-2 Extensions – CARES Actions Desk Aid*. However, Operations Memos 99-41, 99-60, 99-69, 99-89 will provide further detail if necessary.

W-2 TIME LIMIT AND EXTENSION POLICY REMINDERS

The decision making process regarding extensions begins with the participant and the agency discussing the need for an extension. *A discussion regarding extensions must take place between the FEP and the participant no later than when the participant reaches 18 months of eligibility in any one W-2 employment position.* However, W-2 agencies may choose to discuss extensions earlier than 18 months.

To identify participants who are approaching their 18th month or who have reached their 18th month in a W-2 employment position, two Enterprise Output Solutions (EOS) reports have been created: The “Individual Clocks Report” (C785) and the “W2T/CSJ Individuals With Clocks At 18+ Months” (C739). These reports are similar with the exception that the C785 shows every participant on a worker’s caseload and the amount of time used on each W-2 clock. The C739 shows every participant on a worker’s caseload that has reached 18 months of eligibility in a W-2 employment position clock. The C739 is a new report recently made available to the W-2 agencies through EOS.

If a participant believes that he or she needs an extension to the 24-month time limit, the W-2 agency must determine whether or not the individual qualifies for an extension based on the extension criteria.

Criteria for granting all W-2 employment position extensions are:

Trial Job: The participant has made all appropriate efforts to find and accept unsubsidized employment and has been unable to do so because the local labor market conditions preclude a reasonable unsubsidized employment opportunity for the participant.

Community Service Job (CSJ): The participant has made all appropriate efforts to find and accept unsubsidized employment and has been unable to do so because the local labor market conditions preclude a reasonable unsubsidized employment opportunity and, for the same reason, there are no Trial Jobs available.

W-2 Transition: The participant has made all appropriate efforts to find unsubsidized employment by participating in all assigned activities and significant barriers prevent advancement to a higher W-2 employment position.

Within 2 business days after the FEP receives an alert regarding a participant reaching his or her 20th month of eligibility in a W-2 employment position, the decision must be finalized.

“Finalized” means:

1. The extension decision must be entered in CARES on screen AIWE;
2. The decision must be documented in case comments; and
3. The *W-2 Agency Employment Position Extension Record* documenting the agency’s decision must be in the paper file.

The purpose of the documentation is to ensure that the agency has informed the participant of the availability of an extension, the extension policy and the criteria under which extensions are granted. This record will be used in any Fact Finding reviews or Departmental Reviews that result from a participant petitioning for a review of the W-2 agency’s decision regarding extensions.

If the W-2 agency determines, based on the criteria, that the participant qualifies for an extension the agency would seek state approval by submitting an application to the Division of Economic Support (DES) via the W-2 Contract Manager in the appropriate timeframe.

Extension Timeframes

Submit the *24-Month W-2 Employment Position Extension Request* (DES-11282) form to DES Contract Manager no later than 3 calendar months prior to the last day of the participant’s 24th month. The Department within 1 calendar month of receiving a completed extension request will make a decision on the extension. An extension may be granted for up to 6 calendar months from the last day of the participant’s 24th month. Under rare circumstances, a W-2 agency may need to submit an extension request with less than 3 calendar months remaining in the participant’s 24-month eligibility period.

If, after an extension approval is granted, the W-2 agency determines a subsequent extension period may be necessary, the agency must submit in writing a request for a review of the extension. The *24-Month Extension Review* (DES-11283) form must be submitted to the DES Contract Manager no later than 1 calendar month prior to the last day of the extension period. The Department will respond to extension review requests within 15 days of receipt of the extension review. A reapproval of an extension request may be granted for up to 6 months from the last day of the participant’s current extension.

ENTERING EXTENSION INFORMATION INTO CARES

Up to this point, procedures for entering extension decisions into CARES have been issued through Operations Memos. The CARES procedures outlined in these memos have been compiled in the *W-2 Extensions – CARES Actions* Desk Aid. The attached desk aid was created as a tool to assist agencies when entering extension information into CARES.

CONTACT

DES CARES & Policy Call Center Email: carpolcc@dwd.state.wi.us
Telephone: (608) 261-6317 (Option #1)
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Note: Email contacts are preferred. Thank you.